

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re Innocoll Holdings Public Limited Company  
Securities Litigation

CLASS ACTION

This Document Relates To:  
All Actions

C.A. No. 2:17-cv-00341-GEKP

CLASS ACTION

**NOTICE OF UNOPPOSED MOTION AND MOTION FOR  
ENTRY OF ORDER PRELIMINARILY APPROVING SETTLEMENT  
AND ESTABLISHING NOTICE PROCEDURES**

Lead Plaintiffs Russel Bleiler and Carl Bayney (“Lead Plaintiffs”), on behalf of themselves and all members of the proposed Settlement Class, hereby respectfully move this Court for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (a) preliminarily certifying the Settlement Class; (b) preliminarily approving the Settlement; (c) holding that the manner and forms of notice set forth in the Preliminary Approval Order satisfy due process and provide the best notice practicable under the circumstances; (d) setting a date for the Settlement Hearing; (e) appointing Lead Plaintiffs as Class Representatives and Lead Counsel as Class Counsel; (f) appointing Strategic Claims Services as the Claims Administrator; (g) ordering that Notice substantially in the forms of the proposed notices be given to the proposed Settlement Class; and (h) granting such other and further relief as may be required.

Lead Plaintiffs are filing herewith a memorandum of law and accompanying Stipulation of Settlement and the exhibits attached thereto, incorporated herein by reference, in support of this

motion. The [Proposed] Order Granting Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, negotiated by the Parties, is Exhibit A to the Stipulation and Agreement of Settlement.

Defendants do not oppose the relief sought in the motion.

Dated: November 24, 2021

Respectfully submitted,

**ROSEN LAW FIRM, P.A.**

/s/ Jacob A. Goldberg

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*Lead Counsel for Lead Plaintiffs and the  
Proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this on November 24, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the Parties registered to the Court's CM/ECF system.

/s/ Jacob A. Goldberg  
Jacob A. Goldberg